

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
Plaintiff)	
)	
v.)	No. 07 CR 843
)	
SENECCA WILLIAMS)	Hon. Magistrate Judge Sidney Schenkier
Defendants)	

**DEFENDANT WILLIAM'S MOTION TO MODIFY CONDITIONS OF RELEASE AND
PLACE DEFENDANT IN THE CUSTODY OF HIS UNCLE**

Now comes the Defendant SENECCA WILLIAMS, by and through his attorney Ralph J. Schindler, Jr., and respectfully moves this Honorable Court to grant defendant SENECCA WILLIAM'S motion to modify the conditions of release and place Defendant in the custody of his uncle. In furtherance thereof, Defendant states as follows:

1. On or about December 21, 2007, Defendant Senecca Williams, upon his own recognizance, posted a \$5,000 bond. In the Order Setting Conditions of Release, Defendant Williams was placed in the custody of his sister, Catrice Williams. Unfortunately, Defendant's sister lives in a violent neighborhood with much gang-violence. Since his arraignment, Defendant has and continues to feel threatened in the neighborhood of his custodial residence.
2. Defendant requests that this Court allow Defendant to change custodial residences so that he may move in with his uncle. Defendant has indicated that his uncle and wife agree that Defendant Williams should be placed in their custody. Moreover, Defendant has indicated that his uncle lives in a neighborhood that is less violent and has fewer gang related incidents than his current custodial residence.

3. On January 26, 2008, counsel from the Law Offices of Ralph J. Schindler, Jr. tendered a copy of this motion to AUSA Kruti Trivedi. AUSA Trivedi indicated that the government has no objections to this motion.

WHEREFORE, SENECCA WILLIAMS respectfully requests that this Court modify the conditions of his release to change defendant's place of custodial residence.

Respectfully submitted,

/s/ Ralph J. Schindler, Jr.

Ralph J. Schindler, Jr.
Attorney for SENECCA WILLIAMS

Law Offices of Ralph J. Schindler, Jr.
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(312) 554-1040
Attorney No.: 2484471

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CERTIFICATE OF SERVICE

I, Ralph J. Schindler, Jr., an attorney do certify that I did serve a copy of:

**DEFENDANT WILLIAM'S MOTION TO MODIFY CONDITIONS OF RELEASE AND
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Upon: KRUTI TRIVEDI
Assistant United States Attorney
United States Attorney's Office
219 South Dearborn Street
Chicago, Illinois 60604

and upon all other parties entitled to be served by electronic filing of such motion in accordance with Fed. R. Civ. P. 5 and LR 5.5 and the General Order on Electronic Case Filing (ECF) on this 27th day of February 2008.

Respectfully submitted,

/s/ Ralph J. Schindler, Jr.

Ralph J. Schindler, Jr.
Attorney for SENECCA WILLIAMS

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